

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

MCC MANAGEMENT OF NAPLES, INC.; et al.,	)	
	)	
Plaintiffs,	)	CASE NO. 2:07-cv-387-FtM-29SPC
	)	(For a case pending in the Middle District of Florida)
v.	)	
	)	
ARNOLD & PORTER, LLP; et al.,	)	
	)	
Defendants.	)	
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MCC MANAGEMENT OF NAPLES, INC.; et al.,	)	
	)	
Plaintiffs,	)	CASE NO. 2:07-cv-420-FtM-29DNF
	)	(For a case pending in the Middle District of Florida)
v.	)	
	)	
ARNOLD & PORTER, LLP; et al.,	)	CASE NO. CIV-10-00433-HE
	)	
Defendants.	)	

**INTERNATIONAL BANCSHARES CORPORATION  
AND INTERNATIONAL BANK OF COMMERCE'S MOTION  
TO STAY DEPOSITIONS SET FOR MAY 19 AND 20, 2010  
UNTIL THE COURT RULES ON THE CONTEMPORANEOUSLY  
FILED MOTION TO QUASH AND SUPPORTING BRIEF**

International Bancshares Corporation and International Bank of Commerce  
(collectively "IBC") respectfully submit this request for a motion to stay the depositions of  
Michael R. Ford and Tom Travis noticed for May 19, 2010 and May 20, 2010, respectively,

until the Court rules on the contemporaneously filed Motion to Quash Subpoenas and supporting brief. In support of this Motion, IBC would show the Court as follows:

1. As more fully set detailed in the contemporaneously filed Motion to Quash and supporting brief [DKT # 1], IBC objects to the noticed depositions of Michael R. Ford and Tom Travis set for May 19, 2010 and May 20, 2010. Mr. Ford and Mr. Travis have both given extensive deposition testimony, and testified at trial in *MCC Management of Naples, Inc., et al. v. International Bancshares Corporation, et ano*, CIV-06-1345-M (hereinafter the “Oklahoma Case”) and in *MCC Management of Naples, Inc., et al. v. Arnold & Porter, LLP, et al.*, 2:07-cv-387-FtM-29SPC and 2:07-cv-420-FtM-29DNF. Both Mr. Ford and Mr. Travis have been inconvenienced by giving their depositions and even testifying at the trial in the Oklahoma Case.

2. Until the Court rules on the pending Motion to Quash, IBC requests that the Court stay the depositions until the Court may rule on the Motion to Quash.

WHEREFORE, International Bancshares Corporation and International Bank of Commerce respectfully request that this Court enter an Order staying the depositions of Michael R. Ford and Tom Travis until such time as the Court rules on the pending Motion to Quash the Subpoenas.

s/ Kevin R. Donelson

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2010, I electronically transmitted the attached document to the Clerk of Court using the ECF System for (1) filing and (2) transmittal of a Notice of Electronic Filing to the following ECF registrants: Kurt M. Rupert and David C. Potter.

I also certify that on April 29, 2010, I electronically transmitted the attached document to Richard H. Critchlow.

s/ Kevin R. Donelson